of 4

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Case 2:24-cv-00887-JNP-CMR

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Attorneys for Defendants Utah County and Jeffrey Gray

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF UTAH

BRIDGER LEE JENSEN, an individual; SINGULARISM, a non-profit corporation; PSYCHE HEALING AND BRIDGING, LLC dba PSYCHEDELIC THERAPY JOURNEY, a limited liability company;

Plaintiffs,

v.

UTAH COUNTY, a political subdivision; PROVO CITY, a political subdivision; JEFFREY GRAY, an individual; TROY BEEBE, an individual; BRIAN WOLKEN, an individual; **JACKSON** JULIAN, individual; JOHN DOES 1-4, individuals;

Defendants.

STIPULATION OF ALL PARTIES **REGARDING JANUARY 23-24, 2025, HEARING**

Civil Case No. 2:24-cv-00887-JNP-CMR

Judge Jill N. Parrish

Magistrate Judge Cecilia M. Romero

Defendants Utah County and Jeffrey Gray (collectively "Utah County"), Defendants Provo City, Troy Beebe, Brian Wolken, and Jackson Julian (collectively "Provo") and Plaintiffs Bridger Lee Jensen, Singularism, and Psyche Healing and Bridging, LLC dba Psychedelic Therapy

Journey ("Plaintiffs") hereby notify the Court that they have reached the following agreement and stipulation concerning the hearing scheduled for January 23-24, 2025. [See Dkt. 52].

The parties have agreed not to call any witnesses for live testimony during the hearing scheduled for January 23-24, 2025 (the "hearing"). They have further agreed as follows:

- 1. The parties' briefing filed prior to the hearing, including exhibits, are admitted and may be considered by the Court for purposes of the hearing. Notwithstanding the foregoing, Defendants reserve the right to object to any new exhibits Plaintiffs include with their supplemental reply [see Dkt. 65] or to cross examine any witness(es) concerning the substance of any declarations included with that supplemental reply.
- 2. Testimony and exhibits from the 12/13/24 TRO Hearing are admitted and may be considered by the Court for purposes of the hearing. Provided, however, that this stipulation is without waiver of any objections or ruling on objections made at the time of that hearing.
- 3. The following additional exhibits are admitted and may be considered by the Court for purpose of the hearing:
 - a. January 13, 2025, letter from Provo City, Subject: Business License Not Required for Religious Organizations.
 - b. November 27, 2024, Forensic Analysis Report-CONTROLLED SUBSTANCE ANALYSIS.
 - c. Provo Police, Officer Report for Incident 24PR24922 (updated copy through December 2, 2024) (some information redacted under Federal Rule of Civil Procedure 5.2).
 - d. November 28, 2023, FinCEN Continuing Activity Report (some information redacted under Federal Rule of Civil Procedure 5.2).
 - e. March 12, 2024, FinCEN Continuing Activity Report (some information redacted under Federal Rule of Civil Procedure 5.2).

- f. Psychedelic Mushroom Interest Grows in Utah With Center Opening in Provo, FOX 13 https://www.fox13now.com/news/local-news/psychedelic-News (Nov. 2, 2023), mushroom-interest-grows-in-utah-with-center-opening-in-provo (PDF copy, otherwise cited in Complaint)
- g. Body camera footage from Jan. 17, 2025.
- h. Voluntary Statement Form, 25PR01087, Jan. 17, 2025 (some information redacted under Federal Rule of Civil Procedure 5.2)
- i. Audio recording(s) from service of search warrant.
- Website prints for: Singularism (Ex. J1); BridgerLeeJensen (Ex. J2); į. PsychedelicTherapyJourney (Ex. J3); Jensen's linkedIn (Ex. J4); and PsychedelicTherapyAcademy (Ex. J5).
- Certificate of Organization for Psyche Healing and Bridging, LLC. k.
- Police and EMT reports from Jan. 16, 2025 (some information redacted under Federal 1. Rule of Civil Procedure 5.2).
- Body camera footage from Jan. 16, 2025.
- 911 calls from Jan. 16, 2025. n.
- Docket from Case No. 241404407. o.
- 5. This stipulation is without waiver of any arguments either party contends can or should be determined as a matter of law. For example, this stipulation is not intended to alter the nature of Defendants' pending Motion to Dismiss (Dkt. 40). See generally Fed. R. Civ. P. 12(d).

Subject to the Court's direction, the parties anticipate beginning on January 23, 2025, by (1) arguing Defendants' Motion to Dismiss (Dkt. 40) then (2) arguing legal issues arising from Plaintiffs' Motion for Anti-Suit Injunction (Dkt. 39), and then (3) addressing Plaintiffs' Motion for Preliminary Injunction (Dkt. 9) including any factual questions or issues that arise from the additional exhibits submitted herewith.

Given this stipulation, the parties agree that the second day of the hearing scheduled for January 24, 2025, likely will not be necessary.

Dated this 22nd Day of January, 2025.

JAMES DODGE RUSSELL & STEPHENS, P.C.

/s/ Mitchell A. Stephens

Mitchell A. Stephens Justin L. James

Counsel for Utah County and Jeffrey Gray

PROVO CITY LEGAL

/s/ Nicholas Muhlestein

Gary D. Millward Richard A. Roberts Nicholas Muhlestein

Counsel for Provo City, Troy Beebe, Brian Wolken, and Jackson Julian

FABIAN VANCOTT

/s/ Tanner J. Bean

Tanner J. Bean Anna P. Christiansen Jacqueline M. Rosen

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